

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Melvin J. Lindsey : No. 23-12169-pmm
Debtor :

MOTION TO DETERMINE VALUATION OF SECURED
DEBT OF CREDITOR REGIONAL ACCEPTANCE CORPORATION

Debtor, by his attorney, David M. Offen, make the following Motion to Determine Valuation of Secured Debt and in support hereof, states the following:

1. Debtor filed the above Chapter 13 Petition for Relief on July 21, 2023.

2. The Debtor financed a 2017 Ford Fusion SE with Regional Acceptance Corporation.

3. The value of Debtor's 2017 Ford Fusion SE at time of filing of this case was approximately \$11,378.00.

4. Creditor, Regional Acceptance Corporation filed Proof of Claim No. 5 on August 4, 2023 in the amount of \$23,334.32.

5. The Debtor's car is over 910 days old and as such should only be paid the fair market value of its secured claim with interest and not the amount of \$23,334.32.

WHEREFORE, Debtor, by Attorney David M. Offen, respectfully request this Honorable Court enter an Order to Determining the Valuation of the Secured Debt at \$11,378.00 with interest at 6.5% totaling \$12,662.85 and for such further relief as is necessary.

/s/ David M. Offen
Attorney for Debtor
The Curtis Center
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215-625-9600

Dated: 04/16/2024